

November 10, 2020

**VIA ELECTRONIC FILING**

The Honorable Jocelyn G. Boyd  
Chief Clerk/Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

**Re: Exploration of a South Carolina Competitive Procurement Program for the Competitive Procurement of Energy and Capacity from Solar and Other Renewable Energy Facilities by an Electrical Utility as Allowed by South Carolina Code Section 58-41-20(E)(2) (See Directive Issued on November 25, 2019)  
PSCSC Docket No.: 2019-365-E**

Dear Ms. Boyd:

On October 14, 2020, the Public Service Commission of South Carolina (the “Commission”) issued a Notice of Generic Hearing in the above-referenced docket, setting a hearing date for presentations from stakeholders beginning December 10, 2020, and setting a testimony deadline for interested stakeholders on November 23, 2020, along with a responsive testimony deadline of December 4, 2020. Through this letter, Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP,” together with DEC, the “Duke Utilities”) are providing comments on the scope of the generic docket, and other stakeholders’ comments regarding the appropriateness of utility-specific dockets to consider such competitive procurement programs, as described herein. Given that the testimony deadlines are quickly approaching in this docket, it would be helpful to receive guidance from the Commission on the topics raised in this letter in the near future.

The Duke Utilities understand from communications with other interested stakeholders that the recent actions by the Commission in this docket may be in response to positions taken by the South Carolina Solar Business Alliance, Inc. (“SCSBA”) in the Dominion Energy South Carolina (“DESC”) Integrated Resource Plan (“IRP”) proceeding in Docket No. 2019-226-E. On October 21, 2020, in Docket No. 2019-226-E, the SCSBA filed a Competitive Procurement Action Plan, wherein SCSBA recommended that the Duke Utilities should not be required to participate in any docket that is intended to establish a competitive procurement program for DESC.<sup>1</sup> Additionally, on November 3, 2020, DESC filed a letter in this generic docket requesting that the Commission establish a separate docket for the consideration of whether a competitive procurement program is appropriate for DESC.

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<sup>1</sup> Hearing Exhibit No. 13, filed on October 21, 2020, fn 5 (Docket No. 2019-226-E).

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The Duke Utilities believe that, to the extent the Commission intends to use the generic docket to receive information on competitive procurement programs in general, such as best practices and challenges associated with establishing and administering competitive procurement programs, then a generic docket would be an appropriate vehicle to receive such information. However, to the extent that the Commission intends to use the generic docket to actually establish a competitive procurement program for any individual utility, and intends to receive information as to whether that utility should, in fact, create a competitive procurement program, then separate dockets for each utility should be established, as recommended by DESC and SCSBA.

The Duke Utilities would also note that if the Commission chooses to continue with receiving testimony and holding a hearing in the generic docket, it would be beneficial for stakeholders to receive more specific guidance on what information the Commission is seeking in this docket. Such additional information would be helpful to guide interested stakeholders in understanding the intent of the generic docket and to help provide information that is relevant to the Commission's intended purpose.

Sincerely,



Rebecca J. Dulin

cc: Parties of Record (via email)